

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DEBORAH MEREDITH,

1:16-cv-01102-PAG

Plaintiff,

Hon. Judge Patricia A. Gaughan

v.

UNITED COLLECTION BUREAU, INC.,

Defendant.

**DEFENDANT'S RESPONSE TO
PLAINTIFF'S CONFIRMATORY INTERROGATORY NO. 2**

Defendant United Collection Bureau, Inc. ("UCB"), by and through counsel, submits the following objections and responses to Plaintiff's Confirmatory Interrogatory No. 2:

INTERROGATORY

Interrogatory 2: Provide the total number of cell phone numbers you called, where any prerecorded message was played during any call, where there is an indication in your records that such cell phone number was a "wrong number," i.e. that of a non-debtor; plus the number of calls to each of those numbers.

Answer: UCB played a total of 634 pre-recorded messages during the relevant class period (May 9, 2012, through October 5, 2018). These messages were left on 194 unique cell phone numbers.

Dated: July 2, 2019

UNITED COLLECTION BUREAU, INC.

/s/ Meagan A. Mihalko

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on July 2, 2019, I sent a true and correct copy of the foregoing document via electronic mail to the following counsel of record:

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DEBORAH MEREDITH,)
Plaintiff,) 1:16-cv-01102-PAG
v.) Judge Gaughan
UNITED COLLECTION BUREAU, INC.,)
Defendant.)

VERIFICATION

I, Mark Beirdneau, state that I have read Defendant United Collection Bureau, Inc.'s Answer to Plaintiff's Second Confirmatory Interrogatory, and that the answer contained therein is true and accurate to the best of my knowledge, information, and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 2, 2019.



Mark Beirdneau